



Brian Hurley
Vice President of Regulatory Affairs
ACA Connects–America’s Communications Association
2415 39th Place, NW
Washington, DC 20007

bhurley@acconnects.org
(202) 573-6247

May 24, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Communication of ACA Connects – America’s Communications Association; *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59; *Call Authentication Trust Anchor*, CG Docket No. 17-97; *Promoting Telehealth for Low-Income Consumers*, WC Docket No. 18-213

Dear Ms. Dortch:

On May 22, 2019, Ross Lieberman, Sr. Vice President of Government Affairs for ACA Connects – America’s Communications Association (“ACA Connects”)¹ and I met with Jamie Susskind, Chief of Staff to Commissioner Brendan Carr, to discuss the above-captioned proceedings.

First, ACA Connects expressed its support for the Commission’s adoption of a declaratory ruling that affirms voice providers’ ability to offer robocall blocking services (“call-blocking programs”) to customers on an informed opt-out basis.² As ACA Connects has explained in previous filings, this ruling will empower voice service providers to protect far more of their customers from nuisance calls and scams, while preserving the right of each customer to make an informed choice.³

¹ ACA Connects was known previously as the American Cable Association (“ACA”).

² See *Advanced Methods to Target and Eliminate Unlawful Robocalls et al.*, CG Docket No. 17-59 et al., Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC-CIRC1906-01 (rel. May 16, 2019) (“Public Draft”).

³ See Comments of ACA in CG Docket No. 17-59 (filed Sept. 24, 2018); Reply Comments of ACA in CG Docket No. 17-59 (filed Oct. 9, 2018); Letter From Brian Hurley, ACA, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 17-59 (filed Nov. 13, 2018).

In expressing support for the declaratory ruling, ACA Connects proposed a revision to the text of the Public Draft to affirm the clear intent of the ruling that call-blocking programs may employ third-party call-blocking technologies.⁴ In particular, ACA Connects recommends modifying the second-to-last sentence of paragraph 32 of the Public Draft to read as follows (emphasis added to highlight the revised language):

“At a minimum, we would expect each voice service provider to describe in plain language how *the call-blocking program* chooses to block certain calls...”⁵

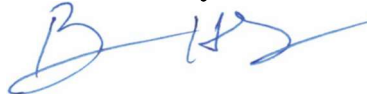
This revision would make clear that the guidance being conveyed in paragraph 32 applies to call-blocking programs in general, including ones that employ third-party robocall blocking technologies.

Finally, ACA Connects discussed briefly the “connected care” proceeding,⁶ consistent with its prior filings in that proceeding.⁷

* * *

I have filed this letter electronically pursuant to section 1.1206 of the Commission’s rules.

Sincerely,



Brian Hurley

cc: Jamie Susskind

⁴ See, e.g., Public Draft, ¶ 26 (noting that “Nomorobo is a widely available call-blocking program” that “[n]early 40 voice service providers offer . . . to their VoIP customers”).

⁵ The passage now reads: “At a minimum, we would expect each voice service provider to describe in plain language how *it* chooses to block certain calls...” See *id.*, ¶ 32 (emphasis added).

⁶ See *Promoting Telehealth for Low-Income Consumers*, WC Docket No. 18-213, Notice of Inquiry, 33 FCC Rcd 7825 (2018).

⁷ See Comments of ACA in WC Docket No. 18-213 (filed Sept. 10, 2018); Reply Comments of ACA in WC Docket No. 18-213 (filed Oct. 10, 2018); Letter From Brian Hurley, ACA, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-213 (filed Nov. 16, 2018).